

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JANE DOE,
SUZETTE LINDGREN,
ANDREW MOYER,
on behalf of themselves and all others
similarly situated, and
MASSACHUSETTS COALITION
FOR THE HOMELESS, and
CENTRAL MASSACHUSETTS
HOUSING ALLIANCE,

Plaintiffs,

v.

CITY OF WORCESTER,
WORCESTER PUBLIC LIBRARY, and
WORCESTER PUBLIC LIBRARY
BOARD OF DIRECTORS,

Defendants.

CIVIL ACTION NO.:

MOTION TO SEAL THE
AFFIDAVIT IN SUPPORT
OF MOTION FOR LEAVE
TO PROCEED UNDER A
PSEUDONYM AND THE
APPLICATION TO
PROCEED WITHOUT
PREPAYMENT OF FEES
AND AFFIDAVIT (AO240)

06-40133

Doe et al v. City of Worcester et al

Doc. 2

Plaintiff Jane Doe ("Ms. Doe"), through counsel, hereby moves to file under seal her Affidavit in Support of the Motion for Leave to Proceed Under a Pseudonym as well as her Application to Proceed without Prepayment of Fees and Affidavit (AO240). As grounds for this Motion, Ms. Doe submits that she fears substantial physical and emotional harm to herself and her child if her true and accurate name is revealed in connection with this action.

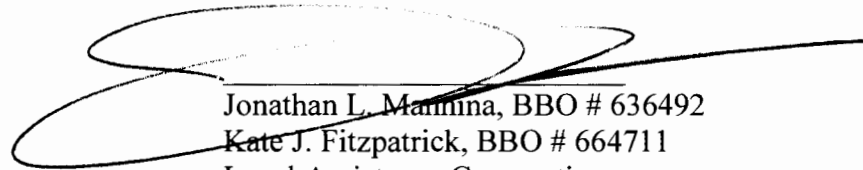
In support of this Motion, Ms. Doe respectfully refers the Court to the Motion for Leave to Proceed Under a Pseudonym, the Memorandum in Support of Jane Doe's Motion for Leave to Proceed Under a Pseudonym, and the Affidavit in Support of Motion for Leave to Proceed Under a Pseudonym, dated July 5, 2006.

Ms. Doe submits that the subject material should remain under seal until further order of this Court. Ms. Doe further submits that, upon the conclusion of this action, the subject material should be delivered to Ms. Doe's counsel of record.

Wherefore, Ms. Doe respectfully requests that the foregoing records be sealed.


Respectfully submitted
On behalf of plaintiff,

Date: July 6, 2006



Jonathan L. Mammia, BBO # 636492
Kate J. Fitzpatrick, BBO # 664711
Legal Assistance Corporation
of Central Massachusetts
405 Main Street, Fourth Floor
Worcester, Massachusetts 01608
(508) 752-3718

Date: July 6, 2006

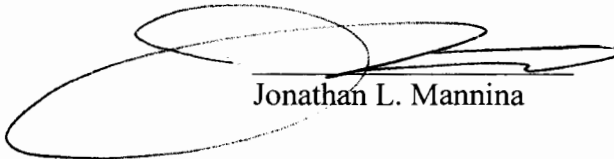


John Reinstein, BBO # 416120
American Civil Liberties Union
of Massachusetts
211 Congress Street, Suite 300
Boston, Massachusetts 02110
(617) 482-3170

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I, Jonathan L. Mannina, certify that I conferred with counsel for the defendant in an effort to resolve or narrow the issues that led to the filing of this motion, as required by Local Rule 7.1.

Dated: July 6, 2006

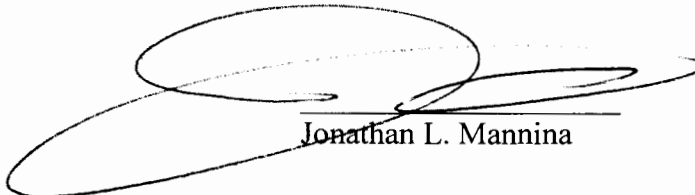


Jonathan L. Mannina

CERTIFICATE OF SERVICE

I, Jonathan L. Mannina, attorney for the plaintiffs, hereby certify that I have on this 6th day of July, 2006, mailed the within, postage prepaid, to David M. Moore, Esq, City Solicitor, 455 Main Street, Room 301, Worcester, MA 01608.

Dated: July 6, 2006



Jonathan L. Mannina